



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

AMY ROBINSON
Senior Counsel
arobinso@law.nyc.gov
Phone: (212) 356-3518
Fax: (212) 356-1148

By ECF

May 3, 2022

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and I am among counsel for the defense in the above-referenced matter. Defendants write to respectfully request a one-week extension from May 4, 2022 until May 11, 2022 to respond to plaintiffs' letter to the Court filed on May 2, 2022, (Dkt. No. 527) pertaining to the production of ARGUS video in this matter. This is defendants' first request for an extension of time to respond to plaintiffs' letter filed May 2, 2022.

This extension is necessary as the undersigned has recently been assigned this portion of discovery and is actively getting up to speed on this issue. As to plaintiffs' position on consent: plaintiffs state: "[p]laintiffs consent to the one-week so long as you include the status you provided with your letter and make clear what specific date Defendants started uploading the video (which from the below representations is one week ago), and whether and why not a date certain for full production can be provided in the City's response." Regardless, this letter is not intended as a response to plaintiffs' May 2, 2022, letter but to request an extension of one week to determine the response to plaintiffs' letter.

Thank you for your consideration herein.

Respectfully submitted,

Amy Robinson s/

Amy Robinson

Senior Counsel

Special Federal Litigation Division

cc: ALL COUNSEL (*via* ECF)